IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SCRUB DADDY, INC., : CIVIL ACTION NO. 2:21-cv-02438 GJP

Plaintiff, : Hon. Gerald J. Pappert

:

ITRIO GLOBAL LLC,

v.

Defendant. :

PLAINTIFF'S MOTION ON BEHALF OF DEFENDANT ITRIO GLOBAL LLC TO EXTEND TIME TO RESPOND TO COMPLAINT

On May 26, 2021, Plaintiff filed the instant action against Defendant, Itrio Global LLC. On Friday, June 25, 2021, counsel for Defendant, Paul Rafelson, Esquire, contacted counsel for Plaintiff and requested an extension of time to respond to Plaintiff's complaint. The parties agreed to request a thirty (30) day extension from the Court. The parties also commenced settlement discussions.

The complaint was served on June 8, 2021, making today the deadline for Defendant's response to the complaint. As Defendant's counsel has not yet entered an appearance, Plaintiff's counsel is moving for the extension of time on behalf of the Defendant.

The parties respectfully request that this extension be granted as the parties are engaging in substantive settlement negotiations. Any consideration the Court could extend in connection with this request would be appreciated.

Respectfully submitted,

Date: June 28, 2021 Anthony J. DiMarino, Esquire

Identification No. 67699

DIMARINO, LEHRER & COLLAZO, P.C.

1905 Spruce Street Philadelphia, PA 19103

856-853-0055

Counsel for Plaintiff Scrub Daddy, Inc.